

**IN THE UNITED STATES COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA,

Plaintiff,

V.

NINE FINANCIAL ACCOUNTS, SIX
REAL PROPERTIES, AND SIX
VEHICLES,

Defendant Properties.

CIVIL ACTION NO. 4:23-CV-02350

VERIFIED CLAIM OF DEBORAH SIMPSON

Deborah Simpson (Mrs. Simpson), claimant, files this Verified Claim pursuant to Rule 5(G)(a) of the Supplemental Rules of Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure. As explained below, Mrs. Simpson claims her interest in the Defendant Property and opposes its forfeiture.

1. The claimant making this Verified Claim is Mrs. Simpson.
2. The Government filed a Verified Complaint for Civil Forfeiture on June 27, 2023. [Dkt. 1]. That Complaint named nine financial accounts, six real properties, and six vehicles as Defendants in the above-captioned action, all of which the Government seeks to have forfeited.
3. Mrs. Simpson was served, through counsel, on August 8, 2023 with the Verified Complaint for Civil Forfeiture.

4. Mrs. Simpson is the sole owner of the 2016 Jaguar VIN SAJWA2GE1GMW02706, defendant *in rem* in the above-captioned case.
5. Mrs. Simpson hereby claims the right to defend this action.
6. The Jaguar has been purchased, funded, or otherwise obtained by legal means.
7. Mrs. Simpson had no knowledge of the alleged fraudulent conduct. Furthermore, she had no reasonable cause to believe that its assets were or potentially could be subject to forfeiture.
8. This notice of claim is signed by Mrs. Simpson, under penalty of perjury, pursuant to Title 28 U.S.C. § 1746.
9. Mrs. Simpson contests the forfeiture of the claimed property and demands the restoration of any and all of her property rights and the rights to defend this action.

Verification

I, Deborah Simpson, verify and declare under penalty of perjury that I have read this Verified Claim, know its contents, and that the matters contained in it are true and correct to the best of my knowledge.

I verify under penalty of perjury that the foregoing is true and correct.

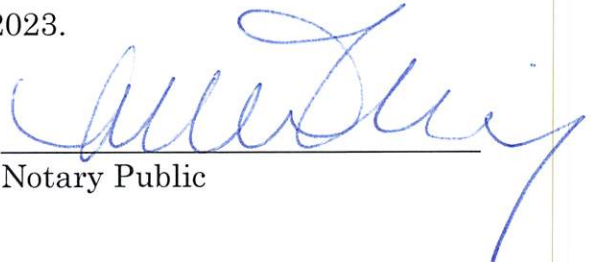
Executed this 22 day of August, 2023.

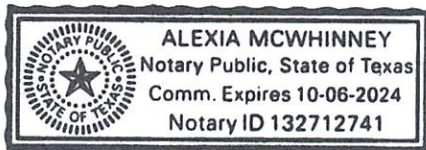

Deborah Simpson

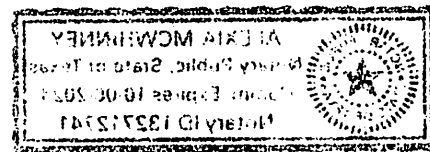
State of Texas

County of Harris

Sworn and subscribed before me this 22 of August, 2023.


Notary Public





Dated: August __, 2023

Respectfully submitted,

MCWHINNEY LAW FIRM PLLC

BY: /s/ Alexia McWhinney
Alexia McWhinney
1337 W. 43rd Street, Suite B
Houston, TX 77018
+1.713.331.5253 Telephone

Counsel for Deborah Simpson

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on all counsel of record through the Court's CM/ECF system on August __, 2023.

/s/ Alexia McWhinney
Alexia McWhinney